



**BOULT ■ CUMMINGS®**  
**CONNERS ■ BERRY PLC**

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2005 OCT 28 PM 4:28  
TR A. DOCKET ROOM

October 28, 2005

Ron Jones, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243


Re: ***Complaint of NuVox Against Frontier Communications for Blocking  
Calls and Request for Immediate Interim Relief***  
**Docket number: 05-00299**

Dear Chairman Jones:

Attached are the responses of NuVox to the staff's data requests submitted yesterday.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:   
Henry Walker

HW/djc  
Enclosure

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to the following on this the 28<sup>th</sup> day of October, 2005.

Guilford F. Thornton, Jr., Esq.  
424 Church Street, Suite 2800  
Nashville, Tennessee 37219

  
\_\_\_\_\_  
Henry Walker

# TENNESSEE REGULATORY AUTHORITY



Ron Jones, Chairman  
Deborah Taylor Tate, Director  
Pat Miller, Director  
Sara Kyle, Director

460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

October 27, 2005

Ms. Susan Berlin.  
NuVox Communications, Inc.  
Two North Main Street  
Greenville, South Carolina 29601

Re: *Complaint of NuVox Against Frontier Communications for Blocking Calls and Request for Immediate Relief*  
Docket No. 05-00299

Dear Ms. Berlin:

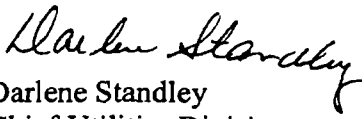
NuVox filed its *Complaint* in the above docket on October 26, 2005. In its *Complaint*, NuVox alleges that Frontier Communications is blocking calls that originate in Frontier's Powell, Tennessee Exchange that should terminate to NuVox customer Southern Solutions located in another part of Knox County. Because NuVox has requested immediate interim relief in its *Complaint*, and because Frontier has not had sufficient time to respond to the *Complaint*, the Authority needs additional information from NuVox in order to proceed in this matter. Therefore, please provide answers to the following questions:

1. The *Complaint* states that NuVox and Frontier are currently negotiating a traffic exchange agreement. When did these negotiations begin?
2. The *Complaint* states that Frontier customers in Powell, Tennessee cannot make calls to NuVox customer Southern Solutions also located in Knox County. When did NuVox acquire Southern Solutions as a customer?
3. Are there any other NuVox customers in Knox County that are being affected by Frontier's refusal to switch calls originating in its Powell Exchange?
4. Has Frontier, at any time in the past, switched traffic originating in its Powell Exchange to any customers of NuVox located in other parts of Knox County? If so, when did Frontier start? When did Frontier stop?

The above requested information should be filed in this Docket and directed to Chairman Ron Jones with the requisite number of copies. Please provide the above requested information by

2:00 pm on October 31, 2005. If you have any questions concerning this matter please contact me at 615-741-2791 ext. 149.

Sincerely,

  
Darlene Standley  
Chief-Utilities Division

cc: Parties of Record  
Docket File

1. The *Complaint* states that NuVox and Frontier are currently negotiating a traffic exchange agreement. When these negotiations begin?

**NuVox and Frontier have been involved in informal discussions about establishing a traffic exchange agreement roughly since September 30, 2005 when NuVox sent a draft agreement via email to Frontier.**

2. The *Complaint* states that Frontier customers in Powell, Tennessee cannot make calls to NuVox customer Southern Solutions also located in Knox County. When did NuVox acquire Southern Solutions as a customer?

**Southern Solutions began receiving service from NuVox on July 20, 2005.**

3. Are there any other NuVox customers in Knox County that are being affected by Frontier's refusal to switch calls originating at its Powell Exchange?

**Yes. NuVox's 865-392-5 code was created in March 2004 and its 865-392-9 code was created in April, 2004. Counsel for Frontier has asserted that these codes are not open for local calling from its switch and never have been. According to counsel for Frontier, their decision not to allow these calls affects all customers of NuVox in Knox County and, currently, no customer of Frontier in Knox County can place a local call to a customer of NuVox. NuVox has received at least one other complaint from another affected customer: Florline South, Inc. located in Knoxville.**

4. Has Frontier, at any time in the past, switched traffic originating in its Powell Exchange to any customers of NuVox located in other parts of Knox County? If so, when did Frontier start? When did Frontier stop?

**NuVox has no record of complaints prior to August of this year but does not know with certainty the answer to this question.**